



December 11, 2012  
NRC:12:061

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Post Submittal Meeting on ANP-10249PA, Revision 1, Supplement 1P, Revision 0 and ANP-10298PA, Revision 0, Supplement 1P, Revision 0**

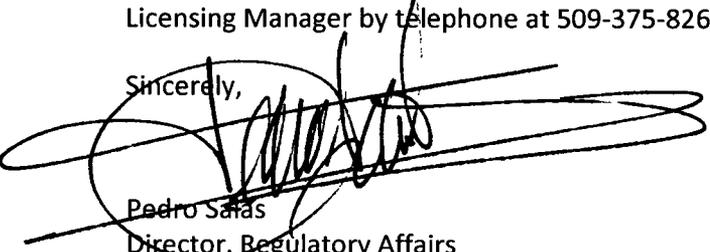
- Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10249PA, Revision 1, Supplement 1P, Revision 0, 'Improved K-factor Model for ACE/ATRIUM 10 Critical Power Correlation'," NRC:11:121, December 21, 2011.
- Ref. 2: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10298PA, Revision 0, Supplement 1P, Revision 0, 'Improved K-factor Model for ACE/ATRIUM 10XM Critical Power Correlation'," NRC:11:122, December 21, 2011.

A post-submittal meeting between AREVA NP Inc. (AREVA NP) and the NRC was held on November 16, 2012 in Rockville, MD to discuss the supplements to topical reports ANP-10249PA, Revision 1 (Reference 1) and ANP-10298PA, Revision 0 (Reference 2.) Enclosed is a copy of the proprietary and non-proprietary viewgraphs presented at the meeting.

AREVA NP considers some of the material contained in the attachment to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

If you have any questions related to this submittal, please contact Mr. Alan B. Meginnis, Product Licensing Manager by telephone at 509-375-8266 or by e-mail at [alan.meginnis@areva.com](mailto:alan.meginnis@areva.com).

Sincerely,



Pedro Salas  
Director, Regulatory Affairs  
AREVA NP Inc.

**Attachments**

1. Proprietary and Non-Proprietary Viewgraphs for the NRC Post Submittal Meeting on the ACE Critical Power Correlation K-factor Method Modification
2. Notarized Affidavit

cc: J. G. Rowley  
Project 728

**AREVA INC.**  
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Tel.: 434 832 3000 [www.aveva.com](http://www.aveva.com)

TODD  
NRR

AFFIDAVIT

STATE OF WASHINGTON    )  
  ) ss.  
COUNTY OF BENTON        )

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in the Attachments to the Letter NRC:12:061, "Post Submittal Meeting on ANP-10249PA, Revision 1, Supplement 1P, Revision 0 and ANP-10298PA, Revision 0, Supplement 1P, Revision 0," dated December 11, 2012 and referred to herein as "Documents." Information contained in these Documents has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and are of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure

is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in these Documents is considered proprietary for the reasons set forth in paragraphs 6(b), 6(d) and 6(e) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in these Documents have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

an 1/2 McCoy

SUBSCRIBED before me this 10th  
day of December, 2012.



Susan K McCoy

Susan K. McCoy  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 1/14/2016